

REMARKS

Claims 27-37, 45, 46, 49, 51 and 53-60 are pending in this application. By this Amendment, claim 27 is amended. No new matter is added.

The courtesies extended to Applicant's representative by Examiner Nguyen at the telephone interview held August 14, are appreciated. The reasons presented at the interview as warranting favorable action are incorporated into the remarks below and constitute Applicant's record of the interview.

I. Claim 27 Satisfies All Formal Requirements

The Office Action objects to claim 27. The Office Action asserts that the recitation "second image signals that are generated by digital to analog conversions ... supplied to one data line," is (grammatically) improper. This rejection is respectfully traversed.

Specifically, the claim 27 recitation of "second image signals that are generated by digital to analog conversions ... supplied to one data line," is supported by Fig. 6. For example, Fig. 6 shows more than one image signal being supplied to a data line. Thus, claim 27 satisfies all formal requirements. Withdrawal of the objection is thus respectfully requested.

II. The Claims Define Patentable Subject Matter

A. Rejection of Claims 27-32, 35, 37, 46, 49, 51 and 53-59

The Office Action rejects claims 27-32, 35, 37, 46, 49, 51 and 53-59 under 35 U.S.C. §103(a) over U.S. Patent No. 5,815,136 to Ikeda et al. in view of U.S. Patent No. 6,339,417 to Quanrud and further in view of U.S. Patent No. 6,049,321 to Sasaki. This rejection is respectfully traversed.

The Office Action asserts that Ikeda discloses the features recited in claim 27, but for the display section, selection switch section and memory formed on one substrate, and second image signals being generated by digital and analog conversion. However, the Office

Action asserts that Quanrud and Sasaki remedy the deficiencies of Ikeda. In particular, the Office Action asserts that Quanrud does disclose forming a display section, selection switch section and memory formed on one substrate. The Office Action further asserts that Sasaki teaches image signals that are generated by a plurality of DACS being supplied to data lines. The Office Action asserts that "it would have been obvious to one of ordinary skill in the art at the time the invention was made to incorporate the image signals that are generated by digital to analog conversions as taught by Sasaki in the system of the combination of Ikeda and Quanrud in order to create analog signals to data lines of matrix display." These assertions are respectfully traversed.

Claims 27-32, 35, 37, 46, 49, 51 and 53-59 would not have been rendered obvious by Ikeda in view of Quanrud and further in view of Sasaki. None of the applied references teach or suggest "second image signals that are generated by digital to analog conversions of the first image signals stored in each of the plurality of memory cell groups being supplied to one data line of the plurality of data lines," as recited in independent claim 27. Nowhere does the applied references teach or suggest this feature.

Further, there is no motivation to modify Ikeda and Quanrud with the teachings of Sasaki. To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference must teach or suggest all the claimed limitations. See *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

The Office Action merely asserts that it would have been obvious to modify the alleged device of Ikeda and Quanrud to include the incorporation of the image signals that are generated by digital to analog conversions, as allegedly taught by Sasaki. However, the

Office Action fails to provide where the alleged device of Ikeda and Quanrud could incorporate the image signals that are generated by digital to analog conversions. By including digital to analog conversions into the alleged device, the principle of operation of the alleged device of Ikeda and Quanrud may change. Thus, one of ordinary skill in the art would not have been motivated to modify the alleged device of Ikeda and Quanrud to incorporate Sasaki's alleged teaching, the image signals that are generated by digital to analog conversions, as asserted by the Office Action.

Further, because no motivation exists in either Ikeda, Quanrud and/or Sasaki to be combined or modified as alleged by the Office Action, the asserted combination is improper and appears to be based on impermissible hindsight.

Thus, claim 27 is patentable over Ikeda, Quanrud and Sasaki. Further, claims 28-32, 35, 37, 46, 49, 51 and 53-59, which depend from claim 27, are also patentable over Ikeda, Quanrud and Sasaki, for at least the reasons discussed above, as well as the additional features recited therein. Withdrawal of the rejection is thus respectfully requested.

B. Rejection of Claims 33, 34 and 36

The Office Action rejects claims 33, 34 and 36 under 35 U.S.C. §103(a) over Ikeda in view of Quanrud and U.S. Patent No. 5,440,718 to Kumagai et al. This rejection is respectfully traversed.

Claims 33, 34 and 36 would not have been rendered obvious by Ikeda in view of Quanrud and Kumagai. Kumagai does not remedy the deficiencies of Ikeda and Quanrud discussed above with respect to claim 27. Kumagai is only cited by the Office Action for its alleged teaching of a plurality of memory cell sections being configured by a dynamic memory. Claims 33, 34 and 36 depend from claim 27. Thus, claims 33, 34 and 36 are patentable over Ikeda, Quanrud, and Kumagai for at least the reasons discussed with respect

to claim 27, as well as the additional features recited therein. Withdrawal of the rejection is thus respectfully requested.

C. Rejection of Claim 60

The Office Action rejects claim 60 under 35 U.S.C. §103(a) over Ikeda in view of Quanrud and U.S. Patent No. 5,170,155 to Plus et al. (Plus) and further in view of U.S. Patent No. 6,472,684 to Yamazaki et al. (Yamazaki). This rejection is respectfully traversed.

Claim 60 would not have been rendered obvious by Ikeda in view of Quanrud and Plus, and further in view of Yamazaki. Plus and Yamazaki do not remedy the deficiencies of Ikeda and Quanrud discussed above with respect to claim 27. Yamazaki is only cited by the Office Action for its alleged teaching of a plurality of memory cells being formed of TFTs. Claim 60 depends from claim 27. Thus, claim 60 is patentable over Ikeda, Quanrud, Plus and Yamazaki for at least the reasons discussed above with respect to claim 27, as well as the additional features recited therein. Withdrawal of the rejection is thus respectfully requested.

III. Conclusion

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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Attachment:
Request for Continued Examination

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